

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

STANFORD INTERNATIONAL BANK,
LTD., *et al.*,

Defendants.

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Civil Action No. 3:09-CV-00298-N

IN RE: STANFORD ENTITIES
SECURITIES LITIGATION

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MDL No. 2099

**AGREED MOTION TO DISTRIBUTE KROLL SETTLEMENT LONG FORM NOTICE
VIA ECF**

TO THE HONORABLE COURT:

COME NOW Receiver Ralph S. Janvey (the “Receiver”) and the Official Stanford Investors Committee (“OSIC”) (collectively, “Movants”) and file this Agreed Motion to Distribute Kroll Settlement Long Form Notice via ECF, and in support thereof would respectfully show the Court the following:

1. On March 7, 2016, Movants filed their Expedited Request for Entry of Scheduling Order and Motion for Order Approving Proposed Settlement with Kroll and for Ancillary Orders and Brief in Support (the “Motion to Approve”) [Doc. 2280] in Civil Action No. 3:09-CV-

00298-N, pending in the United States District Court for the Northern District of Texas (the “SEC Case”). On March 23, 2016, the Court entered the Scheduling Order [Doc. 2290] in the SEC Case.

2. Pursuant to the Scheduling Order, on or before April 13, 2016, the Receiver is required to “cause the Long Form Notice to be distributed by ECF to all parties to and persons who have entered an appearance in any case included in MDL No. 2099, *In re: Stanford Entities Securities Litigation* (N.D. Tex.)” (the “MDL”). See Doc. 2290, at pg. 4.

3. Movants request the Court to permit the Clerk to file the Long Form Notice, attached as Exhibit A, via ECF in the MDL and in all cases included in the MDL. Counsel for Kroll, LLC (f/k/a Kroll Inc.) and Kroll Associates, Inc. agree to this Motion.

Date: April 12, 2016.

Respectfully submitted:

DAVIS & SANTOS, P.C.

By: /s/ Mark Murphy

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COMMITTEE COUNSEL

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served upon all counsel of record via the Court's ECF System on April 12, 2016.

I further certify that on April 12, 2016, I served a true and correct copy of the foregoing document via United States Postal Certified Mail, Return Receipt required to the persons noticed below who are non-CM/ECF participants:

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/s/ Mark Murphy
Mark Murphy